

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

KYLE VENECHUK, individually and on behalf
of others similarly situated,

Plaintiffs,

v.

Case No. 3:13-CV-54-BBC

GRANDE CHEESE COMPANY,

Defendant.

JOINT NOTICE OF SETTLEMENT AND PROPOSED SCHEDULING ORDER

The parties have reached a class-wide settlement and are preparing to jointly move for class/collective certification and preliminary approval of the settlement. The parties believe that it is in the best interests of all parties to finalize the settlement so that all payments are made prior to December 31, 2013. Accordingly, the parties request that the current scheduling order be vacated and the following schedule for briefing and notice related to the upcoming motions for preliminary and final settlement approval be adopted by the Court:

- Class Action Fairness Act ("CAFA") Notice mailed by August 22, 2013;
- Motion for Class Certification and Preliminary Settlement Approval filed by August 22, 2013;
- Class Certification and Preliminary Approval Hearing on August 30, 2013, at 2:00 p.m.;
- Class Counsel to mail notice of settlement within five (5) business days of Court's order granting Motion for Class Certification and Preliminary Settlement Approval;
- Class members will have thirty (30) days to respond to the notice of settlement;

- Motion for Final Settlement Approval and Attorneys' Fees and Costs filed by November 13, 2013;
- Final Approval Hearing on November 20, 2013, at 2:00 p.m.;
- Plaintiffs' Counsel to provide final settlement calculation for each class member to Defendant within seven (7) days of order granting final approval of settlement agreement;
- Defendant to send settlement checks to Plaintiffs' Counsel by overnight mail one (1) business day after the thirty (30) day appeal period for final approval of the settlement agreement expires, assuming no appeal has been filed; and
- Defendant to pay Plaintiffs' Counsel's attorneys' fees and costs one (1) business day after the thirty (30) day appeal period for final approval of the settlement agreement expires, assuming no appeal has been filed.

Dated: July 29, 2013

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ATTORNEYS FOR DEFENDANT

IT IS SO ORDERED:

Date: July 30, 2013

Barbara B. Crabb

Judge Barbara B. Crabb

United States District Court Judge